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14 UNITED STATES DISTRICT COURT

15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 JEREMY PHILLIP PUCKETT,

17 Plaintiff,

18 v.

19 COUNTY OF SACRAMENTO, *et al.*,

20 Defendants.

Case No.: 2:22-cv-00350-KJM-DB

**JOINT STIPULATION AND  
ORDER EXTENDING  
DISCOVERY AND DISPOSITIVE  
MOTIONS DEADLINES**

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 Plaintiff Jeremy Puckett (“Plaintiff”) and Defendants County of Sacramento, Sacramento  
3 County District Attorney’s Office, and Sacramento County Sheriff’s Office (together “Entity  
4 Defendants”), and Defendants Marci Minter, Lori Gregersen, Willard Bayles, Robert Bell, Kay  
5 Maulsby, and Dr. Donald Henrikson (together with Entity Defendants, “Defendants”), by and  
6 through their undersigned counsel, jointly stipulate and agree as follows:

7 1. On February 22, 2022 Plaintiff filed the above-captioned lawsuit under 42 U.S.C. §  
8 1983 against Defendants. (Dkt. 1).

9 2. On November 4, 2022, the court held a scheduling conference, and issued a bench  
10 order setting the following dates “fact discovery shall be completed by 11/17/2023; expert  
11 disclosures shall be completed by 01/19/2024; rebuttal expert witnesses shall be exchanged by  
12 02/19/2024; all expert discovery shall be completed by 03/22/2024; and all dispositive motions,  
13 except for motions for continuances, temporary restraining orders or other emergency applications,  
14 shall be heard by 09/20/2024”. (Dkt. 32).

15 3. Following resolution of a motion to dismiss, Defendants filed answers to Plaintiff’s  
16 complaint on April 25, 2023 and July 31, 2023. (Dkt. 37 & 38).

17 4. Discovery has been ongoing, during which Plaintiff filed a motion to compel (Dkt.  
18 42) regarding responses to requests for production of documents, which was continued by Judge  
19 Barnes, requiring the parties to further meet and confer, and continuing the deadline to complete  
20 fact discovery to January 1, 2024. (Dkt. 46).

21 5. On November 10, 2023, Plaintiff filed a Notice of Motion and Motion to Compel  
22 Responses to Interrogatories and Attendance at 30(b)(6) Depositions. (Dkt. 47).

23 6. On November 21, 2023, Judge Barnes denied Plaintiff’s both motions to compel  
24 without prejudice and indicated there was a need for “further meet and confer efforts.” (Dkt. 53).

25 7. The Parties intend to continue their meet and confer efforts and attempt to informally  
26 resolve the disputes, however Plaintiff anticipates further Court intervention will still be needed.

27 8. The Parties submit that the current schedule will not allow them sufficient time to  
28 accomplish those matters and any follow up that may be necessary.

9. The Parties have not previously sought any other extensions of the deadlines to complete discovery or file dispositive motions. (Dkts. 32 & 46).

10. The Parties have conferred and agree that good cause exists for modifications to the current case schedule in order to facilitate these meet and confer efforts and the orderly completion of discovery.

11. Accordingly, the Parties hereby stipulate and agree, subject to the Court's Order, that the following deadlines be reset at follows:

- Fact discovery shall be completed by June 7, 2024.
- Expert disclosures deadline shall be August 2, 2024.
- Rebuttal expert exchange deadline shall be September 6, 2024.
- All expert discovery shall be completed by October 7, 2024.
- All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be filed<sup>1</sup> by January 31, 2025.

IT IS SO STIPULATED.

Dated: November 29, 2023

By: /s/ Harrison J. Frahn IV  
HARRISON J. FRAHN IV

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*Attorneys for Plaintiff Jeremy Phillip Puckett*

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<sup>1</sup> The parties suggest the deadline be triggered as "filed" rather than "heard" due to difficulties in calendaring and unpredictability in availability in the court's calendar.

1 Dated: November 29, 2023

By: /s/ John R. Whitefleet  
*Attorney for Defendants County of Sacramento,  
Sacramento County District Attorney's Office,  
Sacramento County Sheriff's Office, Marci Minter,  
Lori Gregersen, Willard Bayles, Robert Bell, Kay  
Maulsby*

2  
3  
4  
5 Dated: November 29, 2023

By: /s/ Pamela Shafer  
*Attorney for Defendant Donald Henrikson*

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Jeremy Phillip Puckett,

Plaintiff,

v.

County of Sacramento, *et al.*,

Defendants.

Case No.: 2:22-cv-00350-KJM-DB

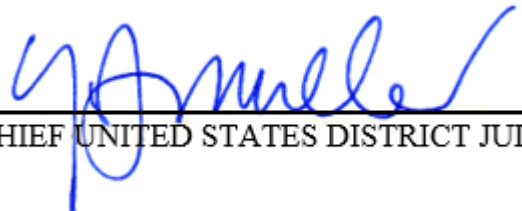
**ORDER EXTENDING  
DISCOVERY AND DISPOSITIVE  
MOTIONS DEADLINES**

Pursuant to the above stipulation, and good cause appearing, the Court modifies the Bench Order (ECF No. 32), as follows:

- Fact discovery shall be completed by June 7, 2024.
- Expert disclosures deadline shall be August 2, 2024.
- Rebuttal expert exchange deadline shall be September 6, 2024.
- All expert discovery shall be completed by October 7, 2024.
- All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be filed by January 31, 2025.

IT IS SO ORDERED.

Dated: November 30, 2023.

  
CHIEF UNITED STATES DISTRICT JUDGE